

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**SAMANTHA JENKINS, EDWARD BROWN, )**  
**KEILEE FANT, BYEON WELLS, MELDON )**  
**MOFFIT, ALLISON NELSON, HERBERT )**  
**NELSON, JR., and TONYA DEBERRY, *et al.* )**  
**) Civil Action No.: 4:15-CV-00252-CEJ**  
**Plaintiffs, )**  
**)**  
**v. )**  
**)**  
**THE CITY OF JENNINGS, )**  
**)**  
**Defendant. )**

## JOINT MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

The Parties, by and through their undersigned counsel, respectfully move this Court for a final Order approving the terms of a proposed class action settlement. In support of this Motion, and for the reasons more fully set forth in the parties' Memorandum of Law in Support, the parties aver as follows:

1. The Court previously granted preliminary approval of the parties' proposed class settlement on July 13, 2016, finding the terms sufficiently fair, reasonable, and adequate to inform the class and proceed to a formal fairness determination. Doc. 33 ("Order"). Pursuant to that Order, the Parties now file this Motion for Final Approval of Class Action Settlement, asking that the Court grant final approval of the proposed settlement and enter the parties' proposed form of judgment.

2. After negotiations, the Parties have reached a proposed settlement of this class action. On or about July 6, 2016, the Parties executed a Class Action Settlement Agreement (“Settlement Agreement” or “Settlement”), a copy of which is attached hereto as Exhibit 1.

3. For the reasons set forth herein and in the attached Memorandum of Law in Support, the proposed settlement agreement between the Plaintiffs and the City of Jennings is fair, reasonable and adequate. The Settlement is the product of arm's length negotiations between Plaintiffs' counsel ("Class Counsel") and Defendant, City of Jennings ("Jennings").

4. The Settlement provides Class Members with substantial and immediate monetary relief and Jennings with certainty and finality, while avoiding the inherent risks, delays, and expenses associated with continued, protracted class action litigation.

5. Accordingly, and consistent with the Memorandum of Law in Support, filed herein, the Parties respectfully request that the Court grant final approval of the proposed settlement.

WHEREFORE, the Parties hereby move this Court for an Order (1) approving the terms of the proposed class action settlement, (2) approving Class Counsel's application for an award of attorneys' fees and costs, and (3) entering Final Order consistent with these findings.

Dated: December 12, 2016

**Respectfully submitted,**

/s/ Thomas B. Harvey  
Thomas B. Harvey (MBE #61734)

/s/ Michael-John Voss  
Michael-John Voss (MBE #61742)

/s/ Blake A. Strobe  
Blake A. Strobe (MBE #68422)  
ArchCity Defenders  
1210 Locust St., 2<sup>nd</sup> Floor  
St. Louis, MO 63103  
(855) 724-2489

/s/ Alec Karakatsanis  
Alec Karakatsanis (E.D. Mo.Bar No. 999294 DC)  
Civil Rights Corps  
910 17<sup>th</sup> St NW, Fifth Floor  
Washington, D.C. 20006  
(202) 681-22721

alec@civilrightscorps.org

/s/ John J. Ammann

John J. Ammann (MBE #34308)

/s/ Stephen Hanlon

Stephen Hanlon (MBE #19340)

/s/ Brendan Roediger

Brendan Roediger (E.D.Mo. Bar No. IL 6287213)

Saint Louis University School of Law

100 N. Tucker Blvd.

St. Louis, MO 63101-1930

(314) 977-2778

broedige@slu.edu

*Attorneys for Plaintiffs and the Class*

/s/ D. Keith Henson

D. Keith Henson, #31988MO

Paule, Camazine & Blumenthal, P.C.

165 North Meramec Ave., Suite 110

Clayton, MO 63105

(314) 727-2266

khenson@pcblawfirm.com

*Attorney for Defendant The City of Jennings*